



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

1595 Wynkoop Street  
DENVER, CO 80202-1129  
Phone 800-227-8917  
<http://www.epa.gov/region08>

**JUN 19 2014**

Ref: 8ENF-UFO

CERTIFIED MAIL 7008-3230-0003-0727-5461  
RETURN RECEIPT REQUESTED

Brad Lane, Production Engineer  
Wesco Operating, Inc.  
120 S. Durbin  
P.O. Box 1650  
Casper, Wyoming 82602

Re: Underground Injection Control (UIC)  
Notice of Violation:  
Loss of Mechanical Integrity  
Lander 11 and Phosphoria 100 Wells  
EPA Well ID # WY20000-02222 and WY20000-02298  
API # 49-013-11813 and 49-013-20260  
Lander and Winkelman Dome Fields  
Fremont County, WY

Dear Mr. Lane:

On June 17, 2014, the Environmental Protection Agency (EPA) learned that the Wesco Operating, Inc. injection wells referenced above failed mechanical integrity tests on or about June 16, 2014. Pursuant to Title 40 of the Code of Federal Regulations Section 144.28(f)(2) (40 C.F.R. § 144.28(f)(2)), you must establish and maintain mechanical integrity. A loss of mechanical integrity is a violation of this requirement.

Pursuant to 40 C.F.R. § 144.28(f)(3), you must immediately cease injection into these wells. Before injection may resume, you must demonstrate that the wells have mechanical integrity by passing a mechanical integrity test (MIT). You must also receive written authorization from the EPA.

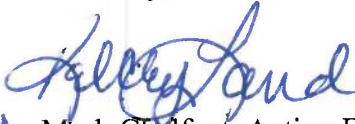
Within thirty (30) days of receipt of this letter, please submit a letter describing what action you intend to take regarding the wells, including a time frame in which you anticipate the work to be completed. It is expected that you will return these wells to compliance within ninety (90) days of the loss of mechanical integrity.

If you choose to plug and abandon these wells, a plugging and abandonment plan must be submitted to the EPA for approval prior to the plugging operation.

Failure to comply with UIC regulations found at 40 C.F.R. Parts 144 and 146 constitutes one or more violations of the Safe Drinking Water Act, 42 U.S.C. § 300h. Such non-compliance may subject you to formal enforcement by the EPA, as codified at 40 C.F.R. Part 22.

If you have any questions concerning this letter, you may contact Sarah Roberts at (303) 312-7056.  
Please direct all correspondence to the attention of Sarah Roberts at Mail Code 8ENF-UFO.

Sincerely,

*for* 

Mark Chalfant, Acting Director  
UIC/FIFRA/OPA Technical Enforcement Programs

cc: Darwin St. Clair, Chairman  
Eastern Shoshone Tribe  
P.O. Box 538  
Fort Washakie, Wyoming 82514

Harrison Shoyo, Co-Chairman  
Eastern Shoshone Tribe  
P.O. Box 538  
Fort Washakie, Wyoming 82514

Ryan Ortiz, Director  
Wind River Environmental  
Quality Commission  
P.O. Box 217  
Fort Washakie, Wyoming 82514

Darrell O'Neal, Chairman  
Northern Arapaho Tribe  
P.O. Box 396  
Fort Washakie, Wyoming 82514

Ronald K. Oldman, Co-Chairman  
Northern Arapaho Tribe  
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Tom Kropatch  
Wyoming Oil & Gas Conservation Commission  
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